

WOODS LONERGAN PLLC

ATTORNEYS AT LAW

woodslaw.com

Monday, December 11, 2023

One Grand Central Place
60 East 42nd St., Suite 1410
New York, NY 10165
Tel: 212 684 2500
Fax: 212 684 2512

James F. Woods, Esq.
jwoods@woodslaw.com

Lawrence Lonergan, Esq.
llonergan@woodslaw.com

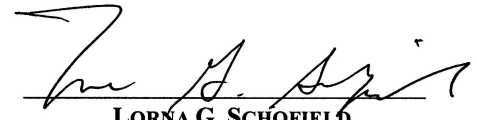
Annie E. Causey, Esq.
acausey@woodslaw.com

Application **GRANTED**. The deadline to complete depositions is extended to **March 15, 2024**. An amended case management plan and a referral to the Mediation Program will issue separately.

Via ECF

Hon. Lorna G. Schofield, U.S.D.J.
Southern District of New York
40 Foley Square, Courtroom 1106
New York, New York 10007

Dated: December 12, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: NuAcess 2 Inc. v. Turkish Airlines Inc.
Case No.: 23-cv-03137-LGS

Dear Judge Schofield:

This firm represents NuAcess 2 Inc. (“Plaintiff” or “NuAcess”) in the above-referenced action (“Action”). Turkish Airlines, Inc. (“Turkish”) and Türk Hava Yollari Anonim Ortakligi (“THY”) (together, “THY Defendants”) are represented by McLaughlin & Stern LLP.

On December 8, 2023, the Court ordered that by December 11, 2023, the parties shall submit any joint letter requesting a stay of discovery, along with a proposed schedule to complete document discovery by January 30, 2024, and a proposed date by which to complete mediation. The Court stated that is prepared to temporarily stay the deposition deadline if the parties complete document discovery and schedule mediation in a timely manner.

THY Defendants and Plaintiff consent to mediate this dispute and request that the Court stay discovery so as to accommodate the mediation, and conserve the parties’ resources. The parties respectfully propose the following:

Schedule to Complete Document Discovery by January 30, 2024

- Documents responsive to the discovery requests served by the parties on September 6, 2023 shall be served by January 30, 2024.

Mediation Scheduling

- The parties will hold the mediation on or before Friday, January 19, 2024.

WOODS LONERGAN PLLC

ATTORNEYS AT LAW

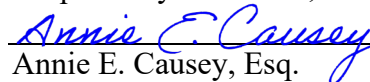
- The parties therefore seek an Order referring this matter to the Court's ADR program pursuant to Local Civil Rule 83.9 and Section 3(a) of the Mediation Program Procedures of the Southern District of New York.

Stay of Deposition Deadline

- The parties seek an Order staying the deposition deadline subject to the mediation.
- If the mediation is unsuccessful, the parties propose to hold depositions by 3/15/2024.

We thank the Court for its time and attention to the parties' request.

Respectfully submitted,


Annie E. Causey, Esq.

CC: All counsel of record *via* ECF.